LEE LITIGATION GROUP, PLLC

148 WEST 24TH STREET, EIGHTH FLOOR NEW YORK, NY 10011 TEL: 212-465-1180 FAX: 212-465-1181 INFO@LEELITIGATION.COM

WRITER'S DIRECT:

212-661-1008

anne@leelitigation.com

May 26, 2020

Via ECF

The Honorable Vernon S. Broderick, U.S.D.J. United States District Court Southern District of New York 40 Foley Square New York, NY 10007

Re: King v. Fedcap Rehabilitation Services, Inc.

Case No. 20-cv-1784

Dear Judge Broderick:

We are counsel to Plaintiff. In light of the crisis caused by COVID-19, we write to respectfully request an extension of time to complete service of the Summons and Complaint.

Due to the COVID-19 crisis, United Process Service, the service company we use to effectuate service, has temporarily closed and halted all service due to Governor Cuomo's Executive Orders suspending non-essential businesses. As a result, the Summons and Complaint has not been served on Defendants at this time, and the deadline for service is approaching.

Therefore, in light of the current pandemic and service hold, Plaintiff requests to extend the time by which Plaintiff has to serve the Summons and Complaint by sixty (60) days, from May 28, 2020 to July 28, 2020.

This is the first request for an extension of time.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/ Anne Seelig
Anne Seelig, Esq.